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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA, )  
12 Plaintiff, )  
13 v. ) 2:06-CR-085-JCM-(GWF)  
14 STEFAN NAGHIU, )  
15 MARIUS CIUREA, )  
16 DUMITRU NICULESCU (aka "Mitica"), )  
17 VASILE TIGANESCU )  
18 (aka "Ioan Postolache" and "Johnny"), )  
19 LETA REMUS, )  
20 VALENTIN GANE (aka "Tutu"), )  
ROBERTO POPA, )  
MARIUS MOREA (aka "Bursuc"), )  
DANIEL VAIDA, )  
ANCA MORARI SONI, )  
Defendants. )

**UNITED STATES OF AMERICA'S NOTICE THAT ITS INTERESTS AND RIGHTS  
EXPIRED IN PROPERTY LISTED IN THE PRELIMINARY AND FINAL ORDERS OF  
FORFEITURE AND THE INDICTMENTS**

The United States respectfully notifies this Court that its interests and rights in the following property expired pursuant to Title 21, United States Code, Section 853(h):

- (a) Linotronic 330 printer;
- (b) Sony Cybershot digital camera;

- 1 (c) Epson Stylus 3000 color printer;
- 2 (d) VasTech DT-14 developing machine;
- 3 (e) DEK 1202 printing machine;
- 4 (f) CRON-180UV printing machine;
- 5 (g) CanadaStamp HP 1000 printing machine;
- 6 (h) Cron Card Offset model CCP-01 press machine;
- 7 (i) Little Joe press model 585;
- 8 (j) MicroTech Scan maker 4 scanner;
- 9 (k) Nu Line Imaging System NL 22-8C;
- 10 (l) Phaser 7300 color printer;
- 11 (m) HP Colorjet 2500L printer;
- 12 (n) Idel-Werk document cutter;
- 13 (o) X-Rite density calibrator;
- 14 (p) Polaroid Colorshot photo printer;
- 15 (q) Dell Optiplex GX 240 computer;
- 16 (r) Apple Power Mac G-4 computer;
- 17 (s) Two (2) laptop computers;
- 18 (t) Dell Optiplex GX-150 computer;
- 19 (u) Compaq Presario computer;
- 20 (v) Lock pick and/or burglary tools; and
- 21 (w) Counterfeit identification documents

22 (all of which constitutes “property”).

23 The United States does not have custody of the property listed in the Preliminary Orders of  
24 Forfeiture (ECF Nos. 283, 364, 367, 368, 369, 370, and 443); the Final Orders of Forfeiture as to the  
25 Defendants (ECF Nos. 393, 395, 407, 409, and 421), and the Final Orders of Forfeiture (ECF Nos.  
26 543 and 544) (“documents”).

1 The United States' forfeited interests and rights in the property listed in the documents have  
2 expired. "Any property right or interest not exercisable by, or transferrable for value to, the United  
3 States shall expire and shall not revert to the defendant . . ." Title 21, United States Code, Section  
4 853(h); Title 18, United States Code, Section 1963(f); *see also United States v. Conner*, 603 F. Supp.  
5 2d 890, 896 (W.D. Va. 2009).

6       Based on the foregoing, this Court should enter an order indicating (a) the United States'  
7    interests and rights in the property listed in the documents have expired; (b) the documents are  
8    reversed and is null and void; and (c) the property listed in the documents will not revert back to the  
9    defendant and/or any person(s) acting in concert with them and/or on their behalf.

10 A proposed order is submitted with this Notice.

11 Dated this 18th day of August, 2015.

DANIEL G. BOGDEN  
United States Attorney

/s/ Daniel D. Hollingsworth  
DANIEL D. HOLLINGSWORTH  
Assistant United States Attorney

## PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on August 18, 2015.

*/s/ Heidi L. Skillin*  
**HEIDI L. SKILLIN**  
Forfeiture Support Paralegal

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MARIUS MOREA (aka "Bursuc"), )  
DANIEL VAIDA, )  
ANCA MORARI SONI, )  
Defendants. )

18 **ORDER**

19 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the United States of  
20 America's interests and rights expired in the following property:

21 (a) Linotronic 330 printer;  
22 (b) Sony Cybershot digital camera;  
23 (c) Epson Stylus 3000 color printer;  
24 (d) VasTech DT-14 developing machine;  
25 (e) DEK 1202 printing machine;  
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13 (s) Two (2) laptop computers;  
14 (t) Dell Optiplex GX-150 computer;  
15 (u) Compaq Presario computer;  
16 (v) Lock pick and/or burglary tools; and  
17 (w) Counterfeit identification documents.

18 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Preliminary Orders  
19 of Forfeiture (ECF Nos. 283, 364, 367, 368, 369, 370, and 443); the Final Orders of Forfeiture as to  
20 the Defendants (ECF Nos. 393, 395, 407, 409, and 421), and the Final Orders of Forfeiture (ECF  
21 Nos. 543 and 544) entered in this case are null and void;

22 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the above-named  
23 property will not revert back to the defendant and/or any person(s) acting in concert with them  
24 and/or on their behalf.

25   
26 UNITED STATES DISTRICT JUDGE  
DATED: August 21, 2015